

FILED

UNITED STATES DISTRICT COURT

for the

Northern District of New York



6th Judicial Division

FEB 24 2024

John M. Domurad, Clerk

Jane Doe, John Doe, John Doe, Jane Doe.

Case No. 3:24-cv-274 (MAD/ML)

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Jonathan Rees aka Greg Ellis
aka Johnathan Rees aka Jonny Rees
aka Jacob Lorenzo

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Jane Doe
Street Address	200 Washington Avenue, 7181
City and County	Endicott
State and Zip Code	New York 13760
Telephone Number	310 666 7462
E-mail Address	janejanejohnjohndoe@proton.me

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	Jonathan Rees aka Greg Ellis aka Jonny Rees
Job or Title <i>(if known)</i>	Voiceover Actor
Street Address	PMB 101, 1770 S.Randall Road, Suite A,
City and County	Geneva, Kane
State and Zip Code	Illinois, 60134-4646
Telephone Number	310 435 3333
E-mail Address <i>(if known)</i>	greg@therespondent.com & greg@monkeytoes.me

Defendant No. 2

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

28 U.S.C. § 1391 Personal Injury, assault, libel and slander

18 U.S.C. § 2261A Cyberstalking

The federal Child Abuse Prevention and Treatment Act (CAPTA) prohibits anyone from committing an act of physical or mental injury upon a child.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* Jane Doe (I), is a citizen of the
State of *(name)* New York.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated
under the laws of the State of *(name)* _____,
and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* Jonathan Rees aka Greg Ellis aka Jonny Ree, is a citizen of
the State of *(name)* Illinois. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.
Or is incorporated under the laws of *(foreign nation)* _____, and has its principal place of business in *(name)* _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

The Defendant's outrageous actions spanning more than 15 months so far from November 2022 ongoing have caused Plaintiffs to lose income due to association to Defendant, Defendant's reputation savaging of Plaintiffs and Defendants vindictive intention to destroy Plaintiffs business, reputation, income and family unit.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Defendant has caused Plaintiffs Emotional Distress, Privacy, and Dignitary Torts: Appropriation of name or likeness, Intrusion upon seclusion, False light, Public disclosure of private facts, along with grooming of Plaintiff (minor), child abuse, child endangerment, cyberstalking and ongoing abuse, bullying and harassment of all four Plaintiffs.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Plaintiff respectfully requests the Court enter judgment in Plaintiffs favor and against Defendant and grant Plaintiffs the following relief:

- I. Awarding Plaintiff damages;
- II. Compensatory damages, including past and future economic damages and non-economic damages;
- III. Punitive damages, as allowed by law;
- IV. Attorneys' fees, as allowed by law;

- V. All costs associated with this action, including, but not limited to, expert fees, deposition expenses, travel expenses, filing fees, and trial presentation expenses on all claims allowed by law;
- VI. Pre-filing, pre-judgment, and post-judgment interest at the highest lawful rate; and
- VII. Appropriate injunctive relief against Defendant, including a permanent injunction ordering Defendant to cease websites of Plaintiffs and any other information of Plaintiffs in Defendants possession.
- VIII. Any other appropriate relief at law and equity that this Court deems just and proper.
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V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 02/21/2024

Signature of Plaintiff	<u>Jane Doe</u>
Printed Name of Plaintiff	<u>Jane Doe</u>

B. For Attorneys

Date of signing: _____

Signature of Attorney	_____
Printed Name of Attorney	_____
Bar Number	_____
Name of Law Firm	_____
Street Address	_____
State and Zip Code	_____
Telephone Number	_____
E-mail Address	_____

1.A The Plaintiff's Continued:

John Doe (II) (minor):

200 Washington Avenue
#7181
Endicott
New York
13760

310 666 7462
janejanejohnjohndoe@proton.me

John Doe (III) (minor):

200 Washington Avenue
#7181
Endicott
New York
13760

310 666 7462
janejanejohnjohndoe@proton.me

Jane Doe (IV):

200 Washington Avenue
#7181
Endicott
New York
13760

310 666 7462
janejanejohnjohndoe@proton.me

II.

John Doe (II), Citizen of New York.
John Doe (III), Citizen of New York.
Jane Doe (IV), Citizen of New York.